

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

Isaiah Paige

Plaintiff(s),

vs.
Nima Investments LLC, Chicago Housing Authority,
Maguie Theophile, Mildred Okwuedei

Defendant(s).

Case No. 1:25-cv-02254
Judge Joan H. Lefkow
Magistrate Judge David Weisman
Randomly Assigned Cat 2 BC

COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS

This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.

1. This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
2. The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
3. Plaintiff's full name is Isaiah Paige.

If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.

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[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Khozem Dohadwala, is
(name, badge number if known)
- ☒ an officer or official employed by Nima Investments LLC;
(department or agency of government)
- ☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Cook County. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about September 24th, 2024 at approximately 2:08 ☐ a.m. ☒ p.m.
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of City of Chicago,
in the County of Cook,
State of Illinois, at 6450 S. Seeley Ave, Chicago, IL 60636,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged)*: Chicago RTLO Section 5-12-150 Prohibition on retaliatory
conduct by landlord, 5-12-070 Landlord's responsibility to maintain, Mun. Code Ch. 5-12-090,
Failure to provide property manager contact information, 5-12-020 Rights and remedies under other
laws.

8. Plaintiff was charged with one or more crimes, specifically:

N/a

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows n/a

☐ Other: n/a

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Nima Investments LLC, said listed

Defendant failed to make repairs as promised or comply with Chicago RTLO for

Emergency repairs regarding inadequate heating, and standard repairs including electrical,

plumbing, foundation, flooring, and other interior and exterior repairs. Landlord and his

representatives violated lease terms and my rights as well by trying to coerce and manipulate

me into paying out of pocket for repairs that were the landlord's legal responsibility such as

maintaining the furnace and coercion used by the landlord, Khozem Dohadwala, to get me to pay

for violations against the landlord that were not my responsibility. The Landlord also, on

9-24-24 retaliated against me by threatening to terminate my lease early for me excusing my rights.

Landlord, has tried to intimidate me repeatedly by sending such threats to the Chicago

Housing Authority enforcement department. Landlord's representees have failed to complete

multiple repairs and have made statements that they were not planning on doing any more

repairs for the remainder of my lease because they were selling the house. Landlord's

property management purposely failed to complete repairs to make me a mandatory move with the CHA therefore trying to informally bypass a formal eviction process.

11. *Plaintiff hereby demands Jury, \$100,000.00 demanded.*
Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Causing severe and ongoing disparate impact that has and still is effecting my health, well being,

safety, leading to conditional proximate causes adding to medical complications and loss of income.

causing further undue burden and harassment leading to a potential program violations within CHA.

causes of loss of mental compacity to process day to day agendas and functionality.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Chicago Housing Authority, is
(name, badge number if known)
- ☒ an officer or official employed by City of Chicago;
(department or agency of government)
- _____ or
- ☐ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Cook County. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 03/10/2022, at approximately 12:00 ☐ a.m. ☒ p.m.
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of _____
City of Chicago, in the County of Cook,
8600 S. Throop St, Chicago, IL 60620
State of Illinois, at _____
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant

municipality, county or township, which custom or policy is the following: *(Leave blank*

if no custom or policy is alleged) Allowed violations of Chicago RTLO Section 5-12-150 Prohibition on retaliatory conduct by a landlord,

continuously allowed and disregarded of same RTLO sec 5-12-070 Landlord's responsibility to

maintain.

8. Plaintiff was charged with one or more crimes, specifically:

n/a

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows n/a

☒ Other: n/a

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Chicago Housing Authority referred to here as CHA allowed "tortious interference with contract",
Incitement of property managers, landlords and owners to commit civil rights violations against
plaintiff including but not limited to false charges and/or criminal allegations against the plaintiff.
CHA has violated my rights of fair housing by sending intent to terminate letters due to malicious
retaliatory actions from housing choice voucher payment recipients, i.e landlords/owners.
CHA has knowingly allowed such activities and misconduct to go on for appx 3-4 years.
Plaintiff alleges CHA has purposely negated policies within CHA, the city of Chicago RTLO,
City, State and federal laws and policies so that CHA Owner participants could make financial
gain by knowingly violating my civil rights.

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Lack of appropriate actions by CHA has led to thousands of dollars of loss income, legal fees,
undue health related and moving fees and a loss of program integrity and other associated costs
with attempting to resolve matters by CHA Owner participants. Expenses exceeding what
plaintiff was able to afford causing loss of pawn and sold items and time and mental and physical well
being.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Maguie Theophile, is
(name, badge number if known)
- ☐ an officer or official employed by _____;
(department or agency of government)
- _____ or
- ☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Cook. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 03/08/2022, at approximately 12:00 ☐ a.m. ☒ p.m.
(month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of _____
City of Chicago, in the County of Cook,
State of Illinois, at 8600 S. Throop st, Chicago, IL 60620,
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☐ used excessive force upon plaintiff;
- ☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:
- _____
- _____

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged):* Chicago RTLO Section 5-12-150 Prohibition on retaliatory
Conduct by landlord, 5-12-070 Landlord's responsibility to maintain, 5-12-110 tenant remedies,
5-12-100 failure to inform of utility provider to shutoff water, 5-12-020 rights and remedies

8. Plaintiff was charged with one or more crimes, specifically:

n/a

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

- ☐ are still pending.
- ☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹
- ☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows n/a

☒ Other: n/a

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Defendant Maguie Theophile failed to complete repairs, harassed and discriminated against

plaintiff, by the name of Herbert Burke at the time of residence. Defendant posted plaintiff's

personal voucher number with the Chicago Housing Authority several times and alleged that

the Chicago Housing Authority advised her to do so. Maguie Theophile retaliated against

plaintiff by also trying to forcibly turn off plaintiff's water without cause or notice in which

plaintiff had to file a TRO and legal case against the defendant to get a court order to stop

such actions from occurring. Defendant did knowingly fail to complete pairs and comply

with city of chicago building code and the owner obligations for repairs through the Chicago

Housing Authority making plaintiff a mandatory move and creating proximate causes that

have further caused an undue disparate impact. Defendant also put plaintiff at risk for other

legal, civil and criminal charges, penalties and other injunctions and fines by dumping trash from

defendants building she owned across the street on to the property of 8600 S. Throop st.,

therefore, causing a loss of access to properly dispose of trash and liability for content of trash.

11. Demand amount is \$150,000.00 which defendant has failed to pay. Jury demanded

12. As a result of defendant's conduct, plaintiff was injured as follows:

Undue burden of irrevocable disparate impact affecting plaintiff's health and well-being. Loss

of income and private and public assistance and access to funds. Proximate causes leading

to ongoing housing crisis and moving costs. Legal costs associated with attempting to resolve

previous legal matters regarding this retaliation, discrimination and violation of my civil rights.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

Complaint + Continue
 [If you need additional space for ANY section, please attach an additional sheet and reference that section.]

4. Defendant, Mildred Okwuedei, is
 (name, badge number if known)
- ☐ an officer or official employed by _____;
 (department or agency of government)
- _____ or
- ☒ an individual not employed by a governmental entity.

If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.

5. The municipality, township or county under whose authority defendant officer or official acted is Cook. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 06/13/2023, at approximately 5:00 ☐ a.m. ☒ p.m.
 (month, day, year)
- plaintiff was present in the municipality (or unincorporated area) of _____
City of Chicago, in the County of Cook,
 State of Illinois, at 1857 S. Komensky ave, Chicago, IL 60623,
 (identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☒ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;
- ☐ searched plaintiff or his property without a warrant and without reasonable cause;
- ☒ used excessive force upon plaintiff;
- ☒ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;
- ☐ failed to provide plaintiff with needed medical care;
- ☒ conspired together to violate one or more of plaintiff's civil rights;
- ☐ Other:
- _____
- _____

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: *(Leave blank if no custom or policy is alleged):* Chicago RTLO section 5-12-150 prohibition on retaliatory

conduct by landlord, 5-12-020 rights and remedies, 5-12-160 illegal lockout

8. Plaintiff was charged with one or more crimes, specifically:

n/a

9. *(Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other")* The criminal proceedings

☐ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.¹

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as follows n/a

☐ Other: n/a

¹Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

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Complaint Continued
 [If you need additional space for ANY section, please attach an additional sheet and reference that section.]

10. Plaintiff further alleges as follows: *(Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)*

Defendant Milbrock Okwuedei,

Defendant and through her property manager Melvin Okwuedei, did forcibly deny access to my unit,

also performing an illegal lockout. Performed an illegal search and seizure of my property.

Defendant and her representaives made false accusations of program violations in regards to

unproved allegations of my dogs defecating on the property. Plaintiff was detanied and treated as

guilty of criminal damage of property by Chicago Police Department due to a false allegation from

Melvin Okwuedei. Lockout was done while I was hospitalized from a suicide attempt which

defendant was aware of and created further proximate causes that led to mental and physical

health and well being loss, also adding to a loss of income and led to ongoing undue disparate

impact inlcuding damage claim amounts for moving and other related costs to resolving the

matters and violations incurred due to defendants' actions and those of her representatives.

Reporting false accusations to the Chicago Housing Authority an in attempt to have my voucher

terminated. I am demanding \$250,000.00 which has not been paid and a jury in this matter

11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

Mental and Physical anguish and conditions causing continued loss of income and other related

conditions also affecting work and school and impeding on my ability to live a well balanced life.

Severe trauma and proximate causes leading to ongoing loss of income and fair housing

conditions, and law enforcement hostility and fear.

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Isaiah Paige

Plaintiff's name (print clearly or type): Isaiah Paige

Plaintiff's mailing address: 6450 S. Seeley Ave

City Chicago State IL ZIP 60636

Plaintiff's telephone number: () _____

Plaintiff's email address (if you prefer to be contacted by email): preferred email-
isaiahpwalker@gmail.co,

15. Plaintiff has previously filed a case in this district. ☒ Yes ☐ No

If yes, please list the cases below.

bankruptcy

Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.

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